

July 11, 1996

Ms. Martha Otto  
U.S. Environmental Protection Agency  
State, Tribal, and Site ID Center  
1235 Jefferson Davis Highway  
Arlington, Virginia 22202

SUBJECT: Quality Assurance (QA) Review of the National Vulcanized Fiber HRS package under contract 68-W2-0030, Work Assignment 2-01, Task 02

Dear Ms. Otto:

DynCorp is submitting this letter to outline the issues identified in the QA review of the second submission of the National Vulcanized Fiber HRS package (CERCLIS ID PAD0048047575) in Region 3. Copies of this letter and the relevant pages of the documentation record, annotated with editorial comments have been sent to Mr. Kevin Wood, U.S. EPA Region 3 NPL Coordinator, for review.

Most of the issues raised by DynCorp in the first QA review have been adequately addressed; however, two major issues still exist. These issues include the establishment of a fishery in the area of actual contamination and the discussion on attribution, which needs to be expanded.

Several references have been cited to establish that the West Branch Clay Creek is a fishery; however, none of these references definitively state that the Level II portion of West Branch Clay Creek is a fishery. In addition, some of the references cited on page 29 of the HRS documentation record are not supportive of West Branch Clay Creek as a fishery. For example, References 42 and 64 state that fishing may not occur because of the lack of attractive fish and the difficulty in accessing the area.

Please refer to pages 302 and 303 of the *HRS Guidance Manual* for an explanation on how to identify the level of contamination for fisheries. The area of contamination for this site is from Level II sample location RC51A to the PPE. Therefore, only 100 feet along West Branch Red Clay Creek is considered to be an area of actual contamination. Reference 63 states that fishing was observed from one of the roads paralleling the creek. Since the fishing was observed by the on-scene coordinator during removal activities, was this fishing observed within the area of contamination? Also, DynCorp recommends deleting references which contradict or do not support that the West Branch Clay Creek is a fishery.



The attribution section on pages 16 and 17 of the HRS documentation record includes additional information (including analytical data) regarding other potential sources of PCBs in the surrounding area; however, this section does not draw any conclusions on how this information relates to the site.

DynCorp recommends that a discussion on how each of the other potential sources of PCBs relate to the NVF site be included in the attribution section. For example, the data from the nearby PECO substation (which indicates similar contaminants and is located upgradient of the site) has been included, but there is no discussion on how this contamination could be influencing the NVF site. Reference 36 indicates that the drainage from the PECO property would not reach the NVF site. This type of information should be included in the attribution section.

In addition, it is unclear from the data presented whether there is sufficient information to include an additional source (contaminated soils) at the NVF facility. The attribution section indicates that soils surrounding several electrical substation locations on NVF property are contaminated by PCBs with similar Arochlors as the observed release. Is the drainage from these substations also entering into the drainage swale (where the observed release has been documented)? If so, these soils should be included as a source or the attribution section will need to be re-written to show only partial attribution of PCB contamination. See page 59 of the *HRS Guidance Manual*.

If you have any questions or comments please call me at (703) 519-1183 or [REDACTED] at (703) 519-1474.

Sincerely,

"non responsive based on revised scope"

DynCorp Region 3 Coordinator

"non responsive based on revised scope"

DynCorp Work Assignment Manager

cc: Terry Keidan, EPA HQ Work Assignment Manager  
Mary Ann Rich, EPA HQ Project Officer  
Kevin Wood, Region 3 NPL Coordinator  
[REDACTED], DynCorp Contracts Administrator  
DynCorp site file

Enclosures